

67,108-022
Capece 2-11

The proposed extension of the teachings of *Telia* to make them consistent with Applicant's claimed invention finds no support whatsoever within the cited references and can only be based upon improper hindsight reasoning resulting from first considering Applicant's description and claims.

The proposed addition of the teachings of the *Bullock* reference do not establish a *prima facie* case of obviousness. There is no benefit to making the addition because *Telia* already relies upon GPS information for making the location determinations within that arrangement. Therefore, adding the GPS information from *Bullock* does not provide any benefit and there is no *prima facie* case of obviousness. Where a proposed combination of references does not provide any benefit to the arrangement in the primary reference, there is no proper legal motivation for modifying the primary reference and the combination cannot be made.

As there is no *prima facie* case of obviousness against any of Applicant's claims, this case is in condition for allowance.

Respectfully submitted,

CARLSON, GASKEY & OLDS

By:



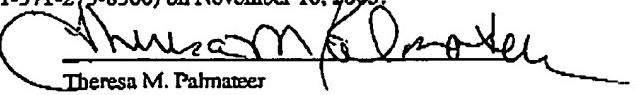
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CERTIFICATE OF FACSIMILE

I hereby certify that this Response relative to Application Serial No. 10/686,451, is being facsimile transmitted to the Patent and Trademark Office (Fax No. 1-571-273-8300) on November 10, 2005.


Theresa M. Palmateer

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